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November 16, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *John “Jack” Yang v. The Bank of New York Mellon Corp., et al.*,  
Case No. 1:20-cv-03179 (AJN)

Dear Judge Nathan:

Pursuant to the Court’s Order dated November 9, 2020 denying Defendants’ request for a stay of discovery (Dkt. No. 43), we respectfully submit the attached proposed Civil Case Management Plan and Scheduling Order (the “Proposed Scheduling Order”) on behalf of all parties.

We note that although Defendants had initially agreed to serve initial disclosures five days after the denial of their application for a stay of discovery (*see* Dkt. No. 37-1 at 2 & Dkt. No. 37-2 at 2), they have now taken the position that they will serve their initial disclosures five days after the entry of the Proposed Scheduling Order.

Thank you for Your Honor’s consideration of this submission.

Respectfully submitted,

/s/ Manisha M. Sheth  
Manisha M. Sheth

cc: Counsel of Record for Defendants